

MICHIGAN

COMPARISON OF PERFORMANCE TRACK'S ACHIEVEMENT LEVEL AND MICHIGAN'S CLEAN CORPORATE CITIZEN (C3) PROGRAM			
Category		Michigan's C3 Program	
EMS		C	The general nature and tone of the C3 EMS requirements are consistent with, and in some cases more detailed and expansive than, the Performance Track requirements. However, some specific elements are not addressed.
EMS Components	Policy	M	C3 policy requirements are largely consistent with, and extend beyond, Performance Track requirements. Additional policy requirements include articulation of the facility's mission and values and recognition that every individual at the establishment can contribute to environmental improvement. Compliance with voluntary commitments is not explicitly addressed in the C3 policy requirements description, but it is indirectly addressed in other parts of the program.
	Planning	M	C3 facilities must identify significant environmental aspects and legal requirements, as well as develop and implement measurable objectives and targets within each level of the facility. Although the C3 program does not explicitly require that the objectives and targets must address legal and performance commitments, facilities within the C3 program have generally met these requirements. In addition, the state reviews each facility's EMS individually and ensures that EMS objectives, targets, and plans are appropriate.
	Implementation and Operation	M	C3 facilities must assign roles and responsibilities for auditing and correcting non-conformance with EMS procedures, and a responsible official (one who has the authority to sign and certify on behalf of the applicant) must approve the EMS. Note that responsible officials are generally members of top management within a facility. Environmental training procedures are required, and C3 facilities must establish and maintain procedures for responding to and reporting on emergency situations. EMS documentation is addressed through requirements for internal communication procedures and for reporting and record-keeping procedures that document environmental status of all operations and activities.
	Checking and Corrective Action	M	C3 facilities must identify operations and activities that have actual or potentially significant environmental impacts and ensure that operations and activities remain within "acceptable parameters." In addition, C3 companies must establish a procedure for regular voluntary environmental self audits and for addressing any violations of applicable environmental requirements.
	Management Review	M	The EMS must be approved by a responsible official or must operate under an adopted corporate environmental policy. In addition, the EMS must define the authority, responsibility, and methods for auditing and correcting nonconformance with the EMS. This requirements is consistent with the Performance Track requirement for a management review of the effectiveness of the EMS and facility performance against EMS goals and objectives.

MICHIGAN

COMPARISON OF PERFORMANCE TRACK'S ACHIEVEMENT LEVEL AND MICHIGAN'S CLEAN CORPORATE CITIZEN (C3) PROGRAM		
Category	Michigan's C3 Program	
EMS Audit/Self-Assessment	●	Facilities are required to conduct a self-assessment of their EMS in order to renew membership in the C3 program, although assessments are not required at the time of initial application to the program.. The self-assessment includes a summary of how the facility has set, revised, and implemented the EMS goals, objectives and targets. In addition, the self-assessment includes a description of strategies the facility is using to resolve any unmet goals, objectives and targets within its EMS and P2 program. Renewal requests are required annually.
One EMS Cycle Required	NA	C3 facilities must have an EMS system in place at the time of application to the C3 program. However, there is no requirement for completion of an EMS cycle.
Scalable to Company Size	M	EMS is expected to be based on the nature and scale of a facility's operations.
Facility Performance (Continuous Improvement)	●	The C3 program has a general requirement for commitment to continuous improvement in the areas most relevant to the facility's environmental impacts, but there are no requirements for past performance, and future performance requirements are less specific than in the Performance Track program.
Past Performance	NA	Applicants to the C3 program need not establish a track record of past environmental performance.
Future Performance	●	C3 facilities must develop and implement measurable environmental goals and objectives in both EMS and pollution prevention planning. However, no specific number of categories or aspects is required.
Public Outreach and Reporting	●	The C3 program differs from the Performance Track in several aspects of its public outreach and reporting requirements, and generally has fewer requirements in this category than Performance Track.
Community References	NA	The C3 program does not require community references. Rather, at least thirty days prior to submitting a C3 application, a facility must provide for public review of and comment on the application and supporting documentation. Any comments received, as well as facility responses to them, are to be included with the application.
Community Outreach and Reporting Plan	●	C3 facilities must establish and maintain an effective public communication process with the public, including local community and environmental interest groups. However, there is no requirement for public reporting on quantitative performance measures or progress toward environmental commitments.

MICHIGAN

COMPARISON OF PERFORMANCE TRACK'S ACHIEVEMENT LEVEL AND MICHIGAN'S CLEAN CORPORATE CITIZEN (C3) PROGRAM		
Category	Michigan's C3 Program	
Annual Report	●	Companies who seek to renew their C3 designation must submit a renewal application summarizing the status of the EMS and pollution prevention plans and their implementation. In addition, the company must report on the status of goals, objectives, and targets, as well as strategies in place to resolve any unmet goals. A facility must re-certify compliance in its C3 renewal application. However, the renewal application is not required to be publicly available.
Verification	●	The C3 verification strategy differs from the Performance Track program, and in some places (e.g. criminal violation prohibition) has more extensive requirements.
Compliance Record Screening (Sustained Compliance)	●	C3 compliance criteria are described in different terms than those in Performance track. C3 facilities may not have any: criminal violation of applicable environmental requirements within the last 10 years; civil fine, penalty, or damages of \$10,000 or more for violation of applicable environmental requirements within the last three years; court finding that the facility is responsible for an illegal action that caused substantial endangerment to the public health, safety, or welfare or to the environment within the last 10 years; or administrative penalty of \$25,000 or more for a violation of applicable environmental requirements that occurred within the last three years. Performance track criteria that specify compliance in terms of "significant" violations may or may not be consistent with the dollar figure penalties described above, depending on the relevant statute. At the time of initial application there can be no unresolved violations.
Self-Certification of Compliance	M	In general, C3 facilities must self-certify that: 1) they are in compliance with all applicable environmental regulations at the time of application; 2) they have addressed any violations cited in a violation notice; and 3) they are in compliance with local environmental requirements. <i>Note:</i> If, when applying to renew membership in the C3 program, a facility cannot meet these compliance requirements, but can to commit to a binding, significant, and beyond-compliance waste or air emissions plan, the C3 program may consider its application. However, this exception has never been used in the C3 program.
Annual Compliance Self-Audits	M	For each year that the facility seeks to renew its C3 status a responsible official must certify that the facility is in compliance. (Presumably, this certification implies that the facility has conducted a self-audit.)
Random Site Visits	NA	There is no provision for program related site visits under C3.
Duration of Participation	M	One year.

MICHIGAN

COMPARISON OF PERFORMANCE TRACK'S ACHIEVEMENT LEVEL AND MICHIGAN'S CLEAN CORPORATE CITIZEN (C3) PROGRAM	
Category	Michigan's C3 Program
<p>Key:</p> <p>M State program requirements are consistent with or exceed Environmental Achievement Track requirements.</p> <p>● State program requirements are not fully consistent with Environmental Achievement Track requirements.</p> <p>NA State program does not address the Environmental Achievement Track requirements.</p> <p>? The extent to which the state program requirements are consistent with Environmental Achievement Track requirements is unclear.</p>	